

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AMERIWAY CORP,

Plaintiff

v

**MAY Y CHEN,
ABILITY CUSTOMS BROKERS, INC.**

Defendants.

19-CV-09047 (VSB) (DCF)

**DEFENDANT’S SUPPLEMENTAL RESPONSE TO AMERIWAY CORPORATION’S
THIRD SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS
TO DEFENDANTS (NOS. 42-63)**

As and for Defendants FURTHER Supplemental Response to Ameriway Corp.’s
 (“Ameriway”) Third Set of Requests of Production of Documents states as follows:

REQUEST FOR PRODUCTION NO. 42:

All native files of the “Terms and Conditions of Service” as shown in Exhibits A, B and C
created prior to April 10, 2019.

Response: Attached hereto is the Affidavit of Todd Scholey, owner of Dros Pros;

Defendant reserves the right to supplement this response if, as and when other customers
or former customers of Defendant consent to revealing their identity and/or Defendant
locates further documentary proof that other customers were sent copies of the terms and
conditions.

Shayne Law Group

Dated: June 16, 2022
Garden City, New York

By: s/Richard E. Schrier
Richard E. Schrier, esq.
Attorney for Plaintiff Ameriway Corporation
595 Stewart Avenue
Garden City, New York 11530
516-739-8000

CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of June, 2022, I caused a copy of Defendant's Supplemental Response to Ameriway Corporation's THIRD SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS TO DEFENDANTS to be served via electronic mail upon: Pete Wolfram, Esq. and Xiyan Zhang, Esq. of the law firm of Stratum Law LLC

Shayne Law Group

Dated: June 16, 2022
Garden City, New York

By: s/Richard E. Schrier
Richard E. Schrier, esq.
Attorney for Plaintiff Ameriway Corporation
595 Stewart Avenue
Garden City, New York 11530
516-739-8000